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PATENT APPLICATION

ATTORNEY DOCKET NO. ___200208087-1___

IN THE
UNITED STATES PATENT AND TRADEMARK OFFICE

Inventor(s):   **Brian James DeHamer**

Application No.: 10/652,988

Filing Date: **August 29, 2003**

Confirmation No.: 2983

Examiner: Vo, Ted T.

Group Art Unit: 2191

Title: **WEB PRESENTATION ARCHITECTURE THAT SUPPORTS PAGE NAVIGATION MANAGEMENT**

Mail Stop Appeal Brief-Patents
Commissioner For Patents
PO Box 1450
Alexandria, VA 22313-1450

TRANSMITTAL OF APPEAL BRIEF

Transmitted herewith is the Appeal Brief in this application with respect to the Notice of Appeal filed on ___August 31, 2007___ .

☒ The fee for filing this Appeal Brief is $510.00 (37 CFR 41.20).

☐ No Additional Fee Required.

(complete (a) or (b) as applicable)

The proceedings herein are for a patent application and the provisions of 37 CFR 1.136(a) apply.

☐(a) Applicant petitions for an extension of time under 37 CFR 1.136 (fees: 37 CFR 1.17(a)-(d)) for the total number of months checked below:

☐ 1st Month $120   ☐ 2nd Month $460   ☐ 3rd Month $1050   ☐ 4th Month $1640

☐ The extension fee has already been filed in this application.

☐(b) Applicant believes that no extension of time is required. However, this conditional petition is being made to provide for the possibility that applicant has inadvertently overlooked the need for a petition and fee for extension of time.

Please charge to Deposit Account 08-2025 the sum of ___$ 510___ . At any time during the pendency of this application, please charge any fees required or credit any over payment to Deposit Account 08-2025 pursuant to 37 CFR 1.25. Additionally please charge any fees to Deposit Account 08-2025 under 37 CFR 1.16 through 1.21 inclusive, and any other sections in Title 37 of the Code of Federal Regulations that may regulate fees.

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Typed Name: Eddie Lou Robinson

Signature: *Eddie Lou Robinson*

Respectfully submitted,

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By _Barry D. Blount_

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Rev 10/07(AplBrief)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of:	§		
Brian James DeHamer et al.	§	Group Art Unit:	2191
	§	Confirmation No.:	2983
Serial No.: 10/652,988	§		
	§	Examiner:	Vo, Ted T.
Filed: August 29, 2003	§		
	§		
For: Web Presentation Architecture that	§	Atty. Docket:	200208087-1
Supports Page Navigation Management	§		NUHP:0126/BLT/GIL

Mail Stop Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

APPEAL BRIEF PURSUANT TO 37 C.F.R. §§41.31 AND 41.37

This Appeal Brief is being filed in furtherance to the Notice of Appeal mailed on

August 27, 2007, and received by the Patent Office on August 31, 2007.

The Commissioner is authorized to charge the requisite fee of $510.00, and any

additional fees which may be necessary to advance prosecution of the present application,

to Account No. 08-2025, Order No. 200208087-1.

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1.   REAL PARTY IN INTEREST

The real party in interest is Hewlett-Packard Development Company, L.P., the

Assignee of the above-referenced application by virtue of the Assignment recorded at reel

014466, frame 0469, and dated August 29, 2003. Accordingly, Hewlett-Packard

Development Company, L.P. will be directly affected by the Board's decision in the

pending appeal.

2.   RELATED APPEALS AND INTERFERENCES

Appellants are unaware of any other appeals or interferences related to this

Appeal. The undersigned is Appellants' legal representative in this Appeal.

3.   STATUS OF CLAIMS

Claims 1-20 are currently pending, are currently under final rejection and, thus,

are the subject of this Appeal.

4.   STATUS OF AMENDMENTS

There are no outstanding amendments to be considered by the Board.

5.   SUMMARY OF CLAIMED SUBJECT MATTER

The present invention relates generally to the field relate of web applications.

Specifically, the application is directed to systems and method for conveniently managing

and handling content and functionalities of web applications. *See,* Application, Abstract

and paragraph 2.

The Application contains four (4) independent claims, namely, claims 1, 8, 15 and 18, all of which are the subject of this Appeal. The subject matter of these claims is summarized below.

With regard to the aspect of the invention set forth in independent claim 1, discussions of the recited features of claim 1 can be found at least in the below cited locations of the specification and drawings. By way of example, exemplary embodiments of claim 1 provide a system for creating web applications, whereby the system comprises a controller generator (e.g., 102) that is adapted to provide a web application (e.g., 20) with a controller (e.g., 18) that receives requests (e.g., 148) for data from users (e.g., 14) and responds to the requests by obtaining requested data. *See, e.g., id.* at paragraphs 9 and 17-21; *see also* FIGS. 1 and 2. The system further comprises a navigation manager generator (e.g., 102) that is adapted to provide a navigation manager (e.g., 108) that saves a user's (e.g., 14) intended destination and subsequently recalls that information to redirect the user back to the intended destination upon completion of a prerequisite. *See, e.g., id.* at paragraphs 17, 25, 33 and 35-37; *see also* FIGS. 1-3.

With regard to the aspect of the invention set forth in independent claim 8, discussions of the recited features of claim 8 can be found at least in the below cited locations of the specification and drawings. By way of example, exemplary embodiments of claim 8 provide a method of creating web applications comprising

creating, with a processor-based device (e.g., 100), a controller (e.g., 18) that receives

requests (e.g., 148) for data from users (e.g., 14) and responds to the requests by

obtaining requested data. *See, e.g., id.* at paragraphs 9 and 17-21; *see also* FIGS. 1 and 2.

The method further comprises providing a navigation manager (e.g., 108) adapted to save

a user's (e.g., 14) intended destination and subsequently recall that information to redirect

the user back to the intended destination upon completion of a prerequisite. *See, e.g., id.*

at paragraphs 17, 25, 33 and 35-37; *see also* FIGS. 1-3.

With regard to the aspect of the invention set forth in independent claim 15,

discussions of the recited features of claim 15 can be found at least in the below cited

locations of the specification and drawings. By way of example, exemplary

embodiments of claim 15 provide a system for creating web applications comprising

means (e.g., 102) for creating a controller (e.g., 18) that provides control functions for a

web application (e.g., 20), the controller being adapted to receive requests (e.g., 148) for

data from users (e.g., 14) and respond to the requests by obtaining requested data. *See,*

e.g., id. at paragraphs 9 and 17-21; *see also* FIGS. 1 and 2. The system further comprises

means (e.g., 108) for setting navigational rules (e.g., 202), enabling the web application

to save a user's (e.g., 14) intended destination and subsequently recall that information to

redirect the user back to the intended destination. *See, e.g., id.* at paragraphs 17, 25, 33

and 35-37; *see also* FIGS. 1-3.

With regard to the aspect of the invention set forth in independent claim 18, discussions of the recited features of claim 18 can be found at least in the below cited locations of the specification and drawings. By way of example, exemplary embodiments of claim 18 provide a tangible machine readable medium (e.g., 100) comprising code that is adapted to save a user's (e.g., 14) intended destination and subsequently recall that information to redirect the user back to the intended destination upon completion of the prerequisite. *See, e.g., id.* at paragraphs 10, 17, 25, 33 and 35-37; *see also* FIGS. 1-3.

6.   GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

First Ground of Rejection for Review on Appeal:

Appellants respectfully urge the Board to review and reverse the Examiner's first ground of rejection in which the Examiner rejected claims 18-20 under 35 U.S.C. §101 as being directed to non-statutory subject matter.

Second Ground of Rejection for Review on Appeal:

Appellants respectfully urge the Board to review and reverse the Examiner's second ground of rejection in which the Examiner rejected claims 18-20 under 35 U.S.C. § 112, First Paragraph, as not supporting a specific or a well established utility.

Third Ground of Rejection for Review on Appeal:

Appellants respectfully urge the Board to review and reverse the Examiner's third

ground of rejection in which the Examiner rejected claims 18-20 under 35 U.S.C. § 112,

Second Paragraph, as being indefinite to particularly point out and distinctly claim the

subject matter which Appellants regard the invention.

Fourth Ground of Rejection for Review on Appeal:

Appellants respectfully urge the Board to review and reverse the Examiner's

fourth ground of rejection in which the Examiner rejected claims 1-20 under 35 U.S.C. §

102(b) as being anticipated by "WebSplitter: A Unified XML Framework for Multi-

Device Collaborative Web Browsing", ACM, 2000, to Han et al., (hereinafter "the Han

reference").

7.   ARGUMENT

As discussed in detail below, the Examiner has improperly rejected the pending

claims. Further, the Examiner has misapplied long-standing and binding legal precedents

and principles in rejecting the claims under Sections 101, 112 and 102. Accordingly,

Appellants respectfully request full and favorable consideration by the Board, as

Appellants respectfully assert that claims 1-20 are currently in condition for allowance.

A.   **Ground of Rejection No. 1:**

With respect to the rejection of claims 18-20 under Section 101, the Examiner

stated that:

> The invention is "not supported by either a specific
> asserted utility or well established utility. The specification
> does not describe or include any utility for a claimed
> subject matter in claims 18-20."

See, Final Office Action, page 4.

Appellants respectfully traverse the rejection.

The Appellants respectfully assert that the present claims are directed to statutory

subject matter. Any analysis of whether a claim is directed to statutory subject matter

begins with the language of 35 U.S.C. §101, which reads:

> Whoever invents or discovers any new and useful
> process, machine, manufacture, or composition of matter,
> or any new and useful improvement thereof, may obtain a
> patent therefore, subject to the conditions and requirements
> of this title.

In interpreting Section 101, the Supreme Court stated that Congress intended

statutory subject matter to "include *anything* under the sun that is made by man."

Diamond v. Chakrabarty, 447 U.S. 303, 309, 206 U.S.P.Q. 193, 197 (1980) (emphasis

added). Although this statement may appear limitless, the Supreme Court has identified

three categories of unpatentable subject matter: laws of nature, natural phenomena, and

abstract ideas. *See*, *Diamond v. Diehr*, 450 U.S. 175, 182, 209 U.S.P.Q. 1, 7 (1981).

Accordingly, so long as a claim is not directed to one of the three specific areas listed

above, the claim is directed to patentable subject matter. Thus, it is improper to read

restrictions into Section 101 regarding subject matter that may be patented where the

legislative history does not indicate that Congress clearly intended such limitation. *In re*

Alappat, 31 U.S.P.Q.2d 1545, 1556 (Fed. Cir. 1994) (citing *Chakrabarty* 447 U.S. at

308).

For example, the fact that a claim includes or is directed to an algorithm is no

ground for holding a claim is directed to non-statutory subject matter. *See, In re*

Iwashashi, 12 U.S.P.Q.2d 1908, 1911 (Fed. Cir 1989). Rather, the proscription against

patenting an algorithm, to the extent it still exists, is narrowly limited to *mathematical*

algorithms in the abstract, e.g., describing a mathematical algorithm as a procedure for

solving a given type of mathematical problem. *See, AT&T Corp. v. Excel*

Communications, Inc., 50 U.S.P.Q.2d 1447, 1450 (Fed. Cir 1999). Indeed, the courts are

aware that any step-by-step process, be it electronic, chemical, or mechanical, involves an

algorithm. *Id.* at 1450.

Thus, inquiry into what is statutory subject matter simply requires "an

examination of the contested claims to see if the claimed subject matter as a whole is a

disembodied mathematical concept representing nothing more than a 'law of nature' or

an 'abstract idea, or if the mathematical concept has been reduced to some practical

application rendering it 'useful'" *Id.* at 1451 (citing and quoting *In re Alappat*, 31

U.S.P.Q.2d at 1557). Furthermore, a Section 101 analysis "demands that the focus in any

statutory subject matter analysis be on the *claim as a whole.*" *In re Alappat,* 31

U.S.P.Q.2d at 1557 (citing *Diehr,* 450 U.S. at 192) (emphasis in original). Indeed, the

dispositive inquiry is whether the claim *as a whole* is directed to statutory subject matter,

it is irrelevant that a claim may contain, as part of the whole, subject matter that would

not be patentable by itself. *Id.*

The Appellants respectfully disagree with the Examiner's assertions and

interpretation of the law. Indeed, the systems recited in independent claims 18-20 are

clearly useful for "creating web applications" and are fully supported by the

specification, as set forth below with regard to the rejection of the claims under Section

112, second paragraph. This is all the law requires in order to comply with Section 101.

Accordingly, Appellants submit that independent claims 18-20 are directed to statutory

subject matter.

Appellant further submit that particularly with regard to computer programs, if

they are in a tangible medium, they are considered patentable subject matter under

Section 101. *See In re Beauregard,* 53 F.3d 1583 (Fed Cir. 1995). Indeed, in

Beauregard, the Commissioner of Patents is quoted as stating, "[C]omputer programs

embodied in a tangible medium…are patentable subject matter under 35 U.S.C. §101."

Id. Accordingly, because independent claims each recite, *inter alia,* "A tangible

machine readable medium comprising code," Appellants assert that claims 18-20 are

directed to patentable subject matter under 35 U.S.C. §101. As such, Appellants

respectfully request the Board to reverse the rejection of claims 18-20 under Section 101.

B. Ground of Rejection No. 2:

With regard to the Examiner's rejection of claims 18-20 under 35 U.S.C. §112,

First Paragraph, the Examiner asserted that:

> ... since the claimed invention is not supported by either a
> specific asserted utility or a well established utility for the
> reasons set forth above, one skilled in the art clearly would
> not know how to use the claimed invention.

See, Final Office Action, page 4.

Appellants respectfully traverse the rejection.

1. Legal Precedent

First, regarding the written description requirement, the initial burden of proof

regarding the sufficiency of the written description falls on the Examiner. Accordingly,

the Examiner must present evidence or reasons why persons skilled in the art would not

recognize a description of the claimed subject matter in the applicant's disclosure. *In re*

Wertheim, 541 F.2d 257, 262, 191 U.S.P.Q. 90, 96 (CCPA 1976). The Examiner is also

reminded that the written description requirement does not require the claims to recite the

same terminology used in the disclosure. The patentee may be his own lexicographer.

Ellipse Corp. v. Ford Motor Co., 171 U.S.P.Q. 513 (7th Cir. 1971), *aff'd.* 613 F.2d 775

(7th Cir. 1979), *cert. denied,* 446 U.S. 939 (1980). Moreover, any information contained

in any part of the application as filed, including the specification, claims and drawings,

may be added to other portions of the application without introducing new matter. Accordingly, if an application as originally filed contains a claim disclosing material not disclosed in the remainder of the specification, the applicant may amend the specification to include the claimed subject matter. *In re Benno*, 768 F.2d 1340, 226 U.S.P.Q. 683 (Fed. Cir. 1985).

Second, regarding the <u>enablement</u> requirement, the Examiner has the initial burden to establish a *reasonable basis* to question the enablement provided for the claimed invention. *In re Wright*, 999 F.2d 1557, 1562, 27 U.S.P.Q.2d 1510, 1513 (Fed. Cir. 1993). The test for enablement, as set forth by the Supreme Court, is whether the experimentation needed to practice the invention is undue or unreasonable? *Mineral Separation v. Hyde*, 242 U.S. 261, 270 (1916). A patent need not teach, and preferably omits, what is well known in the art. *In re Buchner*, 929 F.2d 660, 661, 18 U.S.P.Q.2d 1331, 1332 (Fed. Cir. 1991). The *undue experimentation* test essentially evaluates whether one of reasonable skill in the art can make or use the invention from the disclosures in the patent coupled with information known in the art without undue experimentation. *U.S. v. Telectronics, Inc.*, 857 F.2d 778, 785, 8 U.S.P.Q.2d 1217, 1223 (Fed. Cir. 1988). As long as the specification discloses at least one method for making and using the claimed invention that bears a *reasonable correlation* to the entire scope of the claim, then the enablement requirement of section 112 is satisfied. *In re Fisher*, 427 F.2d 833, 839, 166 U.S.P.Q. 18, 24 (C.C.P.A. 1970).

As stated above, the rejections under Section 112, First Paragraph, fail to address whether the Appellants satisfied the written description requirement or the enablement requirement. Moreover, the above rejection under Section 112, First Paragraph, stated by the Examiner addresses neither of these requirements. The Appellants submit that the Examiner has misconstrued Section 112, First Paragraph and, in so doing, asserted an erroneous rejection.

Notwithstanding the deficiency of the rejection, Appellants submit that the specification indeed discloses subject matter, enabling one skilled in the art to use the claimed invention. For example, the specification states that

> [0010] The WPA 100 may be configured with a variety of object-oriented programming languages, such as Java by Sun Microsystems, Inc., Santa Clara, California. An object is generally any item that can be individually selected and manipulated. In object-oriented programming, an object may comprise a self-contained entity having data and procedures to manipulate the data. For example, a Java-based system may utilize a variety of JavaBeans, servlets, Java Server Pages, and so forth. JavaBeans are independent, reusable software modules. In general, JavaBeans support introspection (a builder tool can analyze how a JavaBean works), customization (developers can customize the appearance and behavior of a JavaBean), events (JavaBeans can communicate), properties (developers can customize and program with JavaBeans), and persistence (customized JavaBeans can be stored and reused). JSPs provide dynamic scripting capabilities that work in tandem with HTML code, separating the page logic from the static elements. According to certain embodiments, the WPA 100 may be designed according to

the Java 2 Platform Enterprise Edition (J2EE), which is a
platform-independent, Java-centric environment for
developing, building and deploying multi-tiered Web-based
enterprise applications online.

Specification, paragraph 10.

Accordingly, the specification provides the above software tools storable on a

tangible machine readable medium for implementing the claimed configurator generator

and the claimed naviation manager as part of the WPA 100. Further, the specification

specifically outlines code storable and usable with the forgoing software tools for

implementing the navigation manager. For instance, in accordance with the techniques

disclosed in the application, a navigation file (navigation.xml) is given by the following

code:

```
<nav-manager-rules>

    <rule
        portal="itrc"
        path="/ciss/loginRequired.jsp"
        action="push"
        target="/ciss/doLogin.do"/>

    <rule
        portal="itrc"
        path="/ciss/loginSuccess.jsp"
        action="pop" />

</nav-manager-rules>
```

Specification, paragraph 37

Hence, this example illustrates how one skilled in the art may utilize the

navigation manager 108 to implement a push rule to save the current request URL if it

encounters an action forward 164 containing the path "/ciss/Required.jsp" and the current

portal context matches. *See also*, paragraph 38. Accordingly, these examples illustrate

that the specification contains sufficient knowledge for one skilled in the art to practice

the invention. Accordingly, Appellants request that the Board reverse the Examiner's

rejection of claims 18-20 under Section 112, First Paragraph.

C.   Ground of Rejection No. 3:

With regard to the Examiner's rejection of claims 18-20 under 35 U.S.C. § 112,

Second Paragraph, the Examiner asserted that:

> Claims 18-20 recite 'a tangible machine readable medium,
> comprising: code....'. This limitation is indefinite because
> there is no sufficient antecedent basis in the specification.
> Furthermore, 'a medium comprising code' is unclear. It
> should be noted that a medium stores code only.

See, Final Office Action, page 4.

Appellants respectfully traverse the rejection.

1.   Legal Precedent

Although the Examiner may take exception to the terms used in the claims, the

patentee may be his own lexicographer. *Ellipse Corp. v. Ford Motor Co.*, 171 U.S.P.Q.

513 (7th Cir. 1971), *aff'd.* 613 F.2d 775 (7th Cir. 1979), *cert. denied*, 446 U.S. 939 (1980).

The Examiner is also reminded not to equate breadth of a claim with indefiniteness. *In re*

Miller, 441 F.2d 689, 169 U.S.P.Q 597 (CCPA 1971).

In contrast to the Examiner's assertion, the specification discloses a

> WPA 100, which may be adapted to execute on a
> *processor-based device* such as a computer system or the
> like, has certain core features of the MVC computing
> strategy, and various additional features and enhancements
> to improve its architectural operation and performance.

Application, paragraph 16 (Emphasis added.).

As those skilled in the art would appreciate, a tangible machine readable medium may

correspond to one of many components forming the above processor-based device on

which the WPA 100 is executed. That is, by virtue of disclosing a processor-based

device and additional components, such as an object cache manger, a cookie manager and

so forth, the Appellants' specification explicitly, as well as an inherently, teaches a

system in which a processor reads code from a tangible machine readable medium.

Therefore, Appellants submit that the recitation of a "tangible machine readable medium"

clearly has sufficient antecedent basis in the specification. For at least these reasons, the

rejection of claims 18-20 under Section 112, Second Paragraph, is erroneous.

Accordingly, Appellants request the Board to reverse the rejection of independent claim

18-20.

D.   **Ground of Rejection No. 4:**

With respect to the Examiner's rejection of claims 1-20 under 35 U.S.C. § 102(b)

the Examiner's rejections with respect to independent claims 1, 8, 15 and 18 are

exemplary:

As per Claim 1: Han et al. discloses,
A system for creating web applications, the system
comprising: a controller generator that is adapted to provide a
web application with a controller ('PROXY') that receives
requests for data from users and responds to the requests by
obtaining requested data (See Figure 5, PROXY receives
request from creator's laptop and send response); and a
navigation manager generator ('Lecturer/section creator/XML
& Policy file') that is adapted to provide a navigation manager
that saves a user intended destination and subsequently recalls
that information to redirect the user back to the intended (see
Examiner explains in the above argument) upon completion of
a prerequisite (p. 226, left col., sec. 3.1:The proxy registers
itself (1) to the service discovery database so that a client can
find the proxy (2). Next, the session creator clicks on the
desired proxy's hyperlink (3) and the proxy returns a session
login menu requesting the session name and URL of the first
XML Web page (4). Then, the proxy pulls the requested XML
page (5) and its associated policy file (6) into the proxy. The
proxy parses the XML page and policy file to create privilege
groups (7), then sends to the session creator a login menu
requesting username and password (8).' (the underscored phase
reads prerequisite, because in XML document or HTML
document (p.226: left col., first paragraph) this type login
menu in a webpage is a tag "form").

***

As per Claim 8: See rationale addressed in the rejection of
claim 1.

***

 As per Claim 15: See rationale addressed in the rejection
of Claim 1, especially see sec. 4: Client-Side Functions.

***

As per Claim 18: Han discloses, See rationale addressed in
the rejection of claim 1.

See, Final, Office Action, pp. 5-8.

Appellants respectfully traverse the rejection.

1. **Judicial precedent has clearly established a legal standard for a _prima facie_ anticipation rejection.**

Anticipation under Section 102 can be found only if a single reference shows

exactly what is claimed. _Titanium Metals Corp. v. Banner_, 227 U.S.P.Q. 773 (Fed. Cir.

1985). Thus, for a prior art reference to anticipate under Section 102, every element of

the claimed invention must be identically shown in a single reference. _In re Bond_, 15

U.S.P.Q.2d 1566 (Fed. Cir. 1990). Moreover, the prior art reference also must show the

identical invention "_in as complete detail as contained in the ... claim_" to support a

prima facie case of anticipation. _Richardson v. Suzuki Motor Co._, 9 U.S.P.Q. 2d 1913,

1920 (Fed. Cir. 1989) (emphasis added). Accordingly, Appellants need only point to a

single element not found in the cited reference to demonstrate that the cited reference

fails to anticipate the claimed subject matter.

2. **The Examiner's rejection of independent claims 1, 8, 15 and 18 is improper because the rejection fails to establish a _prima facie_ case of anticipation.**

Independent claim 1 recites:

> A system for creating web applications, the system
> comprising:
> > a controller generator that is adapted to provide a
> web application with a controller that receives requests for
> data from users and responds to the requests by obtaining
> requested data; and
> > a navigation manager generator that is adapted to
> provide a navigation manager that _saves a user's intended
> destination and subsequently recalls that information to
> redirect the user back to the intended destination_ upon
> completion of a prerequisite. (Emphasis added.)

Independent claim 8 recites:

> A method of creating web applications, the method comprising:
>
> creating, with a processor-based device, a controller that receives requests for data from users and responds to the requests by obtaining requested data; and
>
> providing a navigation manager adapted to *save a user's intended destination and subsequently recall that information to redirect the user back to the intended destination* upon completion of a prerequisite. (Emphasis added.)

Independent claim 15 recites:

> A system for creating web applications, the system comprising:
>
> means for creating a controller that provides control functions for a web application, the controller being adapted to receive requests for data from users and respond to the requests by obtaining requested data; and
>
> means for setting navigational rules, enabling the web application to *save a user's intended destination and subsequently recall that information to redirect the user back to the intended destination.* (Emphasis added.)

Independent claim 18 recites:

> A tangible machine readable medium, comprising:
>
> code that is adapted to *save a user's intended destination and subsequently recall that information to redirect the user back to the intended destination* upon completion of the prerequisite. (Emphasis added.)

Appellants respectfully submit that the Han reference clearly fails to disclose the above recited subject matter of independent claims 1, 8, 15 and 18. First, the Appellants note that Han. discloses a system for creating personalized partial views of the same Web page, based on a user's access privileges (Han et al., page 221). The Examiner points to

Fig. 1 on page 222 of Han as illustrating a "system for creating web applications."

However, the Han reference states that:

> Figure 1 illustrates integrated multi-user multi-device Web browsing. The session presenter in the upper right requests a Web page whose contents are then split to multiple participants in a joint browsing session.

> Han, page 222.

In other words, Figure 1 discloses a system for creating different views on multiple output devices. This is completely different from the system for creating web applications recited in the claims above. As will be appreciated by one skilled in the art, independent claims 1, 8, 15, and 18 recite an architecture in which a user's intended destination is saved so that the user may be redirected to that location after completion of other activities. This is not disclosed by Han. Instead, Han discloses a single application for creating various views of the same document.

Moreover, Han discloses a proxy that pulls a partial view based on specific completion of a prerequisite by a user (i.e. username and password) (Han, page 226). In other words, Han discloses only one intended destination by the user, namely, the partial view corresponding to a specific prerequisite completion. Since the user's intended destination is the partial view corresponding to the login (prerequisite) that was entered, there is no need to save the user's intended destination for redirection to another, previous path. Thus, the Han reference fails to disclose a navigation manager that saves a

user's intended destination and is capable of <u>redirecting</u> the user back to the intended
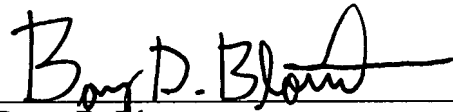
destination.

For at least these reasons, Appellants respectfully submit that independent claims

1, 8, 15, and 18 (and the claims dependent thereon) are not anticipated by the Han

reference. Accordingly, the Appellants respectfully request the Board to reverse the

Examiner's rejection of claims 1-20 under Section 102 based on the Han reference.

Conclusion

Appellants respectfully submit that all pending claims are in condition for

allowance. However, if the Examiner or Board wishes to resolve any other issues by way

of a telephone conference, the Examiner or Board is kindly invited to contact the

undersigned attorney at the telephone number indicated below.

Respectfully submitted,

Date: October 31, 2007

Barry D. Blount
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FLETCHER YODER

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8.   **<u>APPENDIX OF CLAIMS ON APPEAL</u>**

1.   A system for creating web applications, the system comprising:

a controller generator that is adapted to provide a web application with a

controller that receives requests for data from users and responds to the

requests by obtaining requested data; and

a navigation manager generator that is adapted to provide a navigation manager

that saves a user's intended destination and subsequently recalls that

information to redirect the user back to the intended destination upon

completion of a prerequisite.

2.   The system set forth in claim 1, wherein the prerequisite comprises a form.

3.   The system set forth in claim 1, wherein the prerequisite comprises a user

login.

4.   The system set forth in claim 1, wherein the prerequisite comprises an

access rights verification.

5.   The system set forth in claim 1, wherein the navigation manager generator

is adapted to identify the prerequisite for the user request.

6.   The system set forth in claim 1, wherein the navigation manager generator is adapted to store the user request upon identification of the prerequisite.

7.   The system set forth in claim 1, comprising a model object and a view object separate from one another and separate from the controller, wherein the model object is adapted to provide an application state for the web application and the view object is adapted to provide a view presentation for the web application.

8.   A method of creating web applications, the method comprising:

creating, with a processor-based device, a controller that receives requests for data

        from users and responds to the requests by obtaining requested data; and

providing a navigation manager adapted to save a user's intended destination and

        subsequently recall that information to redirect the user back to the

        intended destination upon completion of a prerequisite.

9.   The method set forth in claim 8, comprising providing request tracking logic adapted to track the user request.

10.   The method set forth in claim 8, comprising providing navigational rules for a portal name, a first path corresponding to initiation of the prerequisite, and a second path corresponding to completion of the prerequisite.

11.   The method set forth in claim 10, comprising setting a first navigational

rule to save an intended path corresponding to the user request if a navigational

redirection is provided to the first path.

12.   The method set forth in claim 11, comprises setting a second navigational

rule to recall an intended path corresponding to the user request if a navigational

redirection is provided to the second path.

13.   The method set forth in claim 8, comprising providing request storage

logic adapted to save the user request if subject to the prerequisite.

14.   The method set forth in claim 8, comprising providing request recall logic

adapted to recall the user request if the prerequisite is complete.

15.   A system for creating web applications, the system comprising:

means for creating a controller that provides control functions for a web

        application, the controller being adapted to receive requests for data from

        users and respond to the requests by obtaining requested data; and

means for setting navigational rules, enabling the web application to save a user's

        intended destination and subsequently recall that information to redirect

        the user back to the intended destination.

16.   The system set forth in claim 15, wherein the means for setting navigational rules comprises means for storing the intended path.

17.   The system set forth in claim 15, wherein the means for setting navigational rules comprises means for recalling the intended path.

18.   A tangible machine readable medium, comprising:

code that is adapted to save a user's intended destination and subsequently recall that information to redirect the user back to the intended destination upon completion of the prerequisite.

19.   The tangible machine readable medium set forth in claim 18, comprising a controller generator stored on the machine readable medium, the controller generator being adapted to provide the web application with the ability to receive requests for data from users and respond to the requests by obtaining requested data.

20.   The tangible machine readable medium set forth in claim 18, wherein the navigational control logic comprises navigational rules for a portal name, a first path corresponding to initiation of the prerequisite, and a second path corresponding to completion of the prerequisite.

9.   **EVIDENCE APPENDIX**

None.

10. <u>**RELATED PROCEEDINGS APPENDIX**</u>

None.